

ORIGINAL

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

JOHN R. FEORE, JR.
DIRECT DIAL 202-776-2786
jfeore@dlalaw.com

WASHINGTON, D.C.
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

DOCKET FILE COPY ORIGINAL

July 8, 1997

RECEIVED

JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Policy and Rules Division
Stop Code 1800D

Re: MM Docket Nos. 91-221/87-8, 94-150, 92-51, and 87-154
Television Station KAPA(TV), Kaneohe, Hawaii

Dear Sir or Madam:

We submit herewith an original and four copies of the permittee's response to the FCC's June 17, 1997 *Public Notice* in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Paxson Communications of Honolulu-66, Inc. and Dove Broadcasting Co. of Hawaii, the permittee of Television Station KAPA(TV), Kaneohe, Hawaii.

Should any questions arise concerning this matter, kindly contact the undersigned.

Very truly yours,

John R. Feore, Jr.

JRF/lkr
Enclosure

No. of Copies rec'd 0+4
List ABCDE

LMA REPLY FORM

MARKET: HONOLULU, HAWAII

DMA #: 69

					Degree of Overlap (%)			Nielsen (all day) Audience Share (9am - midnight)		
					City Grade	Grade A	Grade B	11/96	2/97	5/97
Brokered Station:	Channel No. & Call Sign Channel 66 KAPA(TV)	Network Affiliation Independent	Licensed Community Kaneohe, Hawaii	Owner/ Licensee Dove Broadcasting Co. of Hawaii			N/A			Station Not On Air
Brokering Station:	None	N/A	N/A	Paxson Communications of Honolulu-66, Inc.						

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised.	% Time Brokered <u>per week</u>
	5/20/97	2 years	Station unbuilt- Date of commencement of broadcast operations	2 years from date of commencement of broadcast operations	(1) 5 years (2) at request of Programmer	Up to 96.4% (162 hours/ week)

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

The Time Brokerage Agreement for KAPA(TV), Kaneohe, Hawaii was entered into on May 29, 1997 as part of an arrangement whereby Paxson Communications of Honolulu-66, Inc. agreed to construct the station's facilities and lease them to the permittee together with an option to purchase the station. Without the ability to program the station pursuant to the Time Brokerage Agreement, Paxson Communications would not have entered into the Agreements that will enable the station to be promptly constructed.